

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KONINKLIJKE PHILIPS ELECTRONICS
N.V. and U.S. PHILIPS CORPORATION,

Plaintiffs,

v.

CINRAM INTERNATIONAL INC.,
CINRAM INC., CINRAM
MANUFACTURING INC., and John Does
No. 1 through 100,

Defendants.

Civil Action No.08-cv-0515
(CLB)(MDF)

ECF Case

NOTICE OF MOTION AND MOTION OF NON-PARTIES
COOPER & DUNHAM LLP AND IVAN S. KAVRUKOV, ESQ.
TO QUASH PLAINTIFFS' SUBPOENAS *DUCES TECUM*
PURSUANT TO RULES 26 AND 45(c)(3), FED.R.CIV.P.

PLEASE TAKE NOTICE that non-parties Cooper & Dunham LLP and Ivan S. Kavrukov, Esq. will respectfully move this Court on June 20, 2008 at 10:00 a.m., or as soon thereafter as counsel may be heard, at the United States Courthouse at 300 Quarropas Street in White Plains, New York, before the Honorable Charles L. Brieant, United States District Judge, for an Order pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure granting their motion to quash the Subpoenas *Duces Tecum* of Plaintiffs Koninklijke Philips Electronics N.V. and U.S. Philips Corporation, and granting such other and further relief as the Court may deem just and proper.

This motion is based upon the accompanying Memorandum of Law in support of this Motion, the Declaration of Gregory J. Carbo, dated June 6, 2008, the Exhibits annexed thereto and all the pleadings to date.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1, opposing papers, if any, must be served on the undersigned counsel on or before June 12, 2008, and reply papers, if any, will be served on June 13, 2008.

Respectfully submitted,

COOPER & DUNHAM LLP

Dated: June 6, 2008

/s/ William E. Pelton
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June, 2008, I electronically filed the foregoing **NOTICE OF MOTION AND MOTION OF NON-PARTIES COOPER & DUNHAM LLP AND IVAN S. KAVRUKOV, ESQ. TO QUASH PLAINTIFFS' SUBPOENAS DUCES TECUM PURSUANT TO RULES 26 AND 45(c)(3), FED.R.CIV.P.** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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